

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

PATRICK BRADY, et al.,

Plaintiffs,

v.

AIR LINE PILOTS ASSOCIATION,

Defendant.

HONORABLE JOSEPH E. IRENAS

CIVIL ACTION NO. 02-2917  
(JEI)

**CASE MANAGEMENT ORDER**

**APPEARANCES:**

TRUJILLO, RODRIGUEZ & RICHARDS, LLP  
By: Lisa J. Rodriguez  
Nicole M. Acchione  
258 Kings Highway East  
Haddonfield, NJ 08033  
Counsel for Plaintiffs

GREEN JACOBSON, PC  
By: Joseph Jacobson  
Allen P. Press  
7733 Forsyth Boulevard  
Suite 700 Pierre Laclede Center  
St. Louis, MO 63105  
Counsel for Plaintiffs

ARCHER & GREINER, PC  
By: John C. Connell  
Steven J. Fram  
One Centennial Square  
Haddonfield, NJ 08033  
Counsel for Defendants

*Pro Hac Vice:*  
KATZ & RANZMAN, PC  
By: Daniel M. Katz  
4530 Wisconsin Ave., N.W., Suite 250  
Washington, DC 20016  
Counsel for Defendants

**IRENAS**, Senior District Judge:

THIS MATTER having come before the Court on the informal application of Plaintiffs, who requested during a telephone conference on July 12, 2012, that the Court amend the date set forth in the Court's Order filed on May 4, 2012 (Dkt. No. 478) for the service of Plaintiffs' expert reports; and the Court having discussed various discovery and case management issues with counsel on the record in open court on July 31, 2012; the parties having been directed to reach an agreement on these issues and having failed to do so, Court held a telephone conference on September 6, 2012 to resolve these issues; for the reasons stated on the record on July 31, 2012 and at the September 6, 2012 conference; and good cause having been shown;

**IT IS** on this 7th day of September, 2012,

**ORDERED THAT:**

(1) No later than September 28, 2012, counsel for Plaintiffs shall serve expert damage reports for either or both of the two experts previously identified by them. Said reports need not identify at this time the amounts that the class members for whom damages are sought actually earned during any period for which damages are claimed.

(2) Counsel shall appear for a further conference on

Tuesday, October 2, 2012 at 2:00 p.m., at which time counsel should be prepared to discuss (a) the scheduling of the depositions of Plaintiffs' experts with respect to their reports and any discovery that may be necessary in preparation for those depositions; (b) further discovery or other proceedings that may be necessary for Plaintiffs or their experts to determine the appropriate offset amounts for the class members for whom damages are sought; and (c) the date by which counsel for Plaintiffs shall supplement their reports to identify the specific damage claims for the class members for whom damages are sought.

(3) ALPA shall take the depositions of the five (5) named class representatives before September 21, 2012. Said depositions shall be limited to four (4) hours. All depositions shall be scheduled in St. Louis or at such other locations as counsel may agree on dates and at locations mutually convenient to counsel and the parties. In preparation for said depositions, Plaintiffs shall produce by September 11, 2012, the documents sought by ALPA in its Document Request served on May 31, 2012, for the five (5) class representatives (with the exception of the documents sought in Document Request No. 5).

(4) ALPA shall also proceed with the depositions of up to five (5) current or former representatives of the Allied Pilots Association and/or American Airlines before October 10, 2012.

Said depositions shall also be limited to four (4) hours per deposition, subject to a telephonic request to the court for leave for additional time. All depositions shall be scheduled on dates mutually convenient to counsel.

(5) Prior to the scheduling of the depositions of current or former representatives of the Allied Pilots Association and/or American Airlines who are the subject of Paragraph 4 above, defense counsel shall amend ALPA's Rule 26 disclosures to the extent necessary to identify such deponents.

(6) No later than September 28, 2012, counsel for Plaintiffs shall serve Rule 26 disclosures that identify all fact witnesses who they may call to testify during the damages trial.

S/ Joseph E. Irenas

**JOSEPH E. IRENAS, S.U.S.D.J.**